

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR LEAVE TO TAKE TWO ADDITIONAL GOOGLE
DEPOSITIONS**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 16(B) and 37, the Plaintiffs, the United States and Co-Plaintiff States, through their undersigned counsel, hereby respectfully request the Court grant Plaintiffs the authority to take two additional Google depositions, above the ten previously allocated, of Jonathan Bellack and Vlad Sinaniyev due to Google's late discovery productions. Plaintiffs will not re-open two previously taken depositions.

Plaintiffs have met and conferred with Google. Google does not agree to the request, and therefore, the parties are at an impasse.

The grounds for this motion are set forth in the accompanying memorandum.

Dated: October 20, 2023

Respectfully submitted,

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